

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

| | | |
|-------------------------------------|---|----------------------------|
| HY-KO PRODUCTS COMPANY LLC, a |) | |
| Michigan company, |) | |
| |) | |
| Plaintiff, |) | C.A. No. 2:21-cv-00197-JRG |
| v. |) | |
| |) | JURY TRIAL DEMANDED |
| THE HILLMAN GROUP, INC., a Delaware |) | |
| company. |) | |
| |) | |
| Defendant. |) | |

**JOINT MOTION FOR EXPEDITED BRIEFING SCHEDULE ON HY-KO MOTION TO
COMPEL (DKT 106)**

On March 18, 2022, plaintiff and counterclaim defendant Hy-Ko Products Co., LLC (Hy-Ko) filed with the Court a Motion to Compel Pursuant to Discovery Order ¶6, Dkt 106, (“the Motion”). The Motion asks the Court to order defendant and counterclaimant The Hillman Group, Inc. (“Hillman”) to produce a document that it “clawed back” on the basis of privilege.

The Discovery Order (Dkt. 36) requires that Hillman respond within the time period provided by Local Rule CV-7. The Discovery Order, however, requires Hillman to file with the Court within 30 days of the filing of the motion to compel any proof in the form of declarations or affidavits to support its assertions of privilege, along with the documents over which privilege is asserted for in camera inspection.

To facilitate the Court ruling expeditiously on this matter and to conserve judicial resources, the parties have agreed that Hillman will submit its response and any papers supporting its privilege claim, along with the documents over which privilege is asserted for *in camera* review no later than March 29, 2022. After Hillman’s submission, there will be no further briefing.

For these reasons, the parties respectfully request the Court to grant this joint motion to expedite the briefing schedule as described above.

Dated: March 23, 2022

Respectfully submitted,

By: /s/ Steven M. Auvil

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THE HILLMAN GROUP

CERTIFICATE OF CONFERENCE

Counsel for the parties certify that prior to filing this Motion they complied with the meet and confer requirements of Local Rule CV-7(h); and (2).

/s/ Steven M. Auvil

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was filed on March 23, 2022 using the Court's CM/ECF System. Service will be made upon the parties through the CM/ECF System.

By: /s/ Steven M. Auvil